

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

May 1, 2021

BY ECF

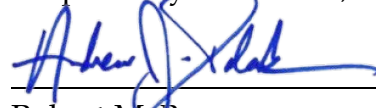
The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti,
19 Cr. 374 (JMF)

Dear Judge Furman:

I write pursuant to the Court's individual rules (Rule 10(C)) regarding the filing of redacted documents on CM/ECF. Tonight, the defense in the above-captioned case filed its omnibus pre-trial motion and seeks leave to keep Exhibits B, C, and F under seal. These exhibits contain sensitive information that is subject to the standing protective order governing the disclosure of confidential materials. Should the Court deny this application to keep the exhibits sealed in their entirety, the defense respectfully requests an opportunity to propose specific redactions for the Court's consideration.

Respectfully Submitted,



Robert M. Baum
Tamara L. Giwa
Andrew J. Dalack
Assistant Federal Defenders

Counsel for Michael Avenatti

Cc: Government Counsel